

EXHIBIT F
FILED UNDER SEAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

--oOo--

WAYMO LLC,

Plaintiff,

Case

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

_____/

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VIDEOTAPED DEPOSITION OF ALEXANDER (SASHA) ZBROZEK

VOLUME II

WEDNESDAY, SEPTEMBER 6, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2693569

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1	MR. BAKER: I want to mark the transcript highly	15:03:46
2	confidential.	15:03:48
3	MR. GONZALEZ: We would object to that, but we'll	15:03:53
4	deal with that later.	15:03:56
5	BY MR. GONZALEZ:	15:03:56
6	Q. Then in that same e-mail, after you say it's	15:03:59
7	"low value," in the very next paragraph, you say,	15:04:03
8	"It's not particularly surprising that he might check	15:04:08
9	things out once in the misguided dream of maybe making	15:04:13
10	individual contribution" --	15:04:15
11	Do you see that?	15:04:16
12	A. I do see that.	15:04:17
13	Q. And the "he" you're talking about is	15:04:20
14	Mr. Levandowski; is that correct?	15:04:21
15	A. That is correct.	15:04:22
16	Q. -- "or maybe taking a look at the progress of	15:04:26
17	a widget."	15:04:26
18	Do you see that?	15:04:27
19	A. I do see that.	15:04:28
20	Q. And you expressed that opinion to the lawyer,	15:04:30
21	understanding that the lawyer was looking into	15:04:33
22	Mr. Levandowski's conduct; correct?	15:04:35
23	MR. BAKER: Objection to form.	15:04:36
24	THE WITNESS: What the lawyer was hoping to get, I	15:04:39
25	don't know.	15:04:39

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1 Do you see that, underneath, with a whole 16:22:53
2 bunch of bullet points? 16:22:55
3 A. I do. 16:22:55
4 Q. Did you write those? 16:22:57
5 A. I believe so. 16:22:58
6 Q. Were any of those ultimately what Google did 16:23:02
7 with respect to the SVN materials? 16:23:05
8 MR. BAKER: Objection to form. 16:23:11
9 THE WITNESS: Man, the formatting took a hit on 16:23:14
10 this. [REDACTED]
11 [REDACTED] 16:23:22
12 BY MR. CHATTERJEE: 16:23:22
13 Q. [REDACTED]? 16:23:27
14 A. [REDACTED]
15 [REDACTED]. 16:23:44
16 Q. [REDACTED]
17 [REDACTED] 16:23:51
18 Do you see that? 16:23:53
19 A. Yes. 16:23:53
20 Q. [REDACTED]
21 [REDACTED]
22 [REDACTED] 16:24:01
23 Do you see that? 16:24:02
24 A. Yes, I see that. 16:24:03
25 Q. What did you mean when you wrote that? 16:24:06

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1 MR. BAKER: Objection to form. 16:26:34

2 THE WITNESS: I think it was probably more clear 16:26:37

3 with the coloring, but I don't remember for sure. 16:26:41

4 BY MR. CHATTERJEE: 16:26:41

5 Q. After you wrote this e-mail, do you know what 16:26:44

6 happened with respect to decisions about how to deal 16:26:46

7 with [REDACTED]? 16:26:50

8 A. I remember generally some things that 16:26:53

9 happened, but I don't remember exactly the order or 16:26:57

10 whether or not my memory is complete. 16:27:00

11 Q. So generally what happened? 16:27:03

12 A. I think in the very short term -- and, again, 16:27:06

13 this is a little fuzzy, it's been a while. 16:27:10

14 I think in the short term, we managed to get 16:27:12

15 [REDACTED] And then we got -- then we got 16:27:19

16 approval to have [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 16:27:54

25 Q. Do you know approximately how long it took 16:27:55

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1 from the time you sent this e-mail to the time that 16:28:00
2 [REDACTED] 16:28:03
3 A. I don't remember. 16:28:04
4 Q. One month, two months? Any sense? 16:28:08
5 A. I just don't remember. 16:28:09
6 Q. If you go to the "Background" section, 16:28:15
7 there's a sentence here -- it's the second from last 16:28:18
8 in that section. [REDACTED]
9 [REDACTED] 16:28:25
10 Do you see that? 16:28:25
11 A. I do.
12 Q. Who told you to use [REDACTED] 16:28:29
13 A. I don't remember. 16:28:30
14 Q. Do you know why it was a nonstarter? 16:28:35
15 A. Yes. 16:28:35
16 Q. Why was it a nonstarter? 16:28:38
17 A. [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED] 16:28:52
21 Q. Do you use the TortoiseSVN software tool? 16:28:59
22 A. Yes, I do. 16:29:00
23 Q. And you use that to access the Subversion 16:29:02
24 server for Project Chauffeur and Waymo today? 16:29:07
25 A. Yes, I do. 16:29:09

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1 MR. CHATTERJEE: What's the next exhibit number? 16:41:03

2 THE REPORTER: 2225. 16:41:05

3 MR. CHATTERJEE: This is Exhibit 2225. 16:41:07

4 (Defendants' Exhibit 2225 was marked.) 16:41:32

5 BY MR. CHATTERJEE: 16:41:32

6 Q. Mr. Zbrozek, what I've handed you is Exhibit 16:41:37

7 2225. Just take a quick look at it, and let me know 16:41:41

8 when you're done. 16:41:42

9 (Witness reviews document.) 16:42:05

10 A. Okay. 16:42:06

11 Q. Do you recognize this document? 16:42:07

12 A. I think so. 16:42:08

13 Q. What is it? 16:42:09

14 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 16:42:24

18 A. That's the domain for it. 16:42:26

19 Q. [REDACTED]

[REDACTED] 16:42:30

21 A. It does not refer to the hosting service. 16:42:35

22 Q. And if you compare it to Exhibit 2216, this 16:42:40

23 e-mail on Exhibit 2225 was sent six days after you 16:42:46

24 sent that electrical [REDACTED] 16:42:50

25 A. That appears to be the case. 16:42:52